

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
W. R. GRACE & CO., et al.,)
Debtors.) Case No. 01-01139 (JKF)
) (Jointly Administered)
) Re: Docket No. 13406

**DEBTORS' SUPPLEMENTAL WITNESS DISCLOSURE
FOR ADJUDICATION OF LACK OF HAZARD ISSUES**

In accordance with this Court's October 13, 2006 Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims ("PD Claims"), Docket No. 13406, the Debtors hereby submit the following supplemental disclosures for witnesses who may testify in person or by deposition at the Adjudication of Lack of Hazard Issues, as described in the 15th Omnibus Objection:

FACT WITNESSES

1. **James Cintani.** James Cintani is a former Grace employee. He will testify on issues related to lack of hazard. He will describe relevant Grace products generally, including but not limited to (i) the manufacture, sale, application and use of the products on job sites and in buildings, (ii) the history of the products, (iii) the products' formulation and reformulation; and, (iv) other facts relevant to the lack of hazard issue. Contact information: c/o Lawrence E. Flatley, Reed Smith LLP, 435 Sixth Avenue, Pittsburgh, PA 15219, (412) 288-3106.

2. **Thomas F. Egan.** Thomas Egan is a former Grace employee. He will testify on issues related to lack of hazard. He will describe relevant Grace products generally, including but not limited to (i) the manufacture, sale, application and use of the products on job sites and in buildings, (ii) the history of the products, (iii) the products' formulation and reformulation; and,

(iv) other facts relevant to the lack of hazard issue. Contact information: c/o Lawrence E. Flatley, Reed Smith LLP, 435 Sixth Avenue, Pittsburgh, PA 15219, (412) 288-3106.

3. Debtors may call other fact witnesses on putative lack of hazard issues, including but not limited to, witnesses to testify about Debtors' asbestos-containing products' history, workers' compensation claims and the alleged presence of trace amounts of tremolite in vermiculite and chrysotile.

EXPERT WITNESSES

1. **Charles L. Blake, CIH.** Mr. Blake is Vice President and Director of Technical Services for Bureau Veritas Clayton Services, Inc., 3380 Chastain Meadows Parkway, Suite 300, Kennesaw, Georgia 30144. He has been employed at Clayton since 1978. Mr. Blake received his Bachelor of Science Degree in Chemical Engineering from the Worcester Polytechnic Institute in 1967. Prior to joining the Clayton, he was employed in industry and served in the US Army, was a corporate staff engineer at Helena Chemical Company where he functioned as corporate industrial hygienist conducting industrial hygiene surveys and designing worker protection systems for the company, was a Chemical Engineer Industrial Hygienist at The Aetna Insurance Company and was a chemical process engineer with EI du Pont de Nemours. He obtained his certification as a CIH in 1977 and has maintained that certification continuously for the past 29 years. His career with Clayton has included work involving nearly all aspects of industrial hygiene; however, matters involving asbestos have comprised the majority of his professional practice. This has included measurements of airborne asbestos concentrations in workplace and other settings ranging from manufacturing plants, refineries and chemical plants to schools, office buildings, private homes, apartment buildings, automobile repair shops and others. In addition, he has conducted basic research on the subject of reentrainment of asbestos fibers from surfaces. His other asbestos related research has focused on workplace exposure. He is published in the peer-reviewed literature on matters involving worker exposures to asbestos.

To the extent the Libby claims are not resolved prior to the hearing on the lack of hazard issues, Mr. Blake may testify concerning the lack of hazard at the properties that are at issue in the Libby Claims, including testimony that: the residents of Libby, Montana are not at significant health risk from exposure to asbestos arising from disturbance of soil and soil-like media alleged to contain amphibole material from the Libby mine; use of Federal Government (OSHA, MSHA and EPA) permissible exposure limits and standards for human exposure to asbestos in evaluating potential risk levels to Libby residents is appropriate and suitably conservative; the levels of foreseeable exposure to airborne asbestos fiber and resulting doses to Libby claimants are insignificant regarding development of any asbestos related diseases; and there is no scientifically reliable basis to correlate alleged findings of amphibole asbestos in soil or soil-like media with any meaningful potential for Libby residents' exposure to airborne asbestos fibers. He may also testify concerning the release of asbestos fibers from materials or media containing asbestos and potential for reentrainment of particles.

2. **Expert(s) on Risk Assessment.** The Debtors may call on additional expert(s) to address whether Grace's in-place asbestos-containing products pose an unreasonable risk of harm to building occupants.

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In addition to the witnesses listed above, the Debtors reserve the right to call to testify at the hearing: (1) any fact or expert witness listed in Debtors' Preliminary Witness Disclosure for Adjudication of Lack of Hazard Issues (Docket No. 13959); (2) any fact or expert witness listed on any other party's witness disclosure for the Adjudication of Lack of Hazard issues; and, (3) any claimant who submitted a property damage claim, as well as any Person that signed any property damage claim form, to testify regarding the facts surrounding the claims(s) that they submitted and/or signed. In addition, the Debtors continue to analyze the PD claims submitted in these Chapter 11 cases and reserve the right to supplement this disclosure with additional fact and expert witnesses that may be needed to address lack of hazard issues raised by those claims.

Dated: December 22, 2006

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